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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF RYAN SILA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
EXHIBITS IN OPPOSITION TO
GOOGLE'S MOTION TO STRIKE**

Judge: Hon. Richard Seeborg
Courtroom 3 – 17th Floor
Date: February 13, 2025
Time: 1:30 p.m.

DECLARATION OF RYAN SILA

I, Ryan Sila, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. Dkt. 232. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal portions of the exhibits attached to Plaintiffs' opposition to Google's motion to strike. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal portions of Exhibit 2, Exhibit 3, and Exhibit 9, which are attached to the declaration of Mark Mao in opposition to Google's Motion to Strike.

4. The information requested to be sealed is being designated by Plaintiffs as "Confidential" pursuant to the parties' Stipulated Protective Order (Dkt. 70).

5. Specifically, the portions at issue reveal the Plaintiffs' home addresses and phone numbers. If the Court were to deny sealing this information, Plaintiffs could be subjected to a heightened risk of injury, including identity theft.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of January, 2025, at Hoboken, New Jersey.

/s/ Ryan Sila